

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF WISCONSIN  
GREEN BAY DIVISION**

**ANDREW L. COLBORN,**

**Plaintiff,**

**vs.**

**NETFLIX, INC.; CHROME MEDIA LLC,  
F/K/A SYNTHESIS FILMS, LLC;  
LAURA RICCIARDI; AND MOIRA  
DEMOS,**

**Defendants.**

**Civil No.: 19-CV-484-PP**

**DECLARATION OF MATTHEW E. KELLEY**

I, Matthew E. Kelley, under penalty of perjury and subject to 28 U.S.C. § 1746, declare as follows:

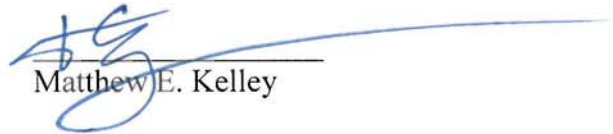
1. I am one of the attorneys for the defendants in the above-captioned action. I have personal knowledge of the matters set forth herein.

2. Attached hereto as Exhibit A is a true and correct copy of a printout that I made of the article, Joy Press, *This Is the Netflix Exec to Thank for Your Wild Wild Country Binge*, VANITY FAIR (June 15, 2018), [https://www.vanityfair.com/hollywood/2018/06/lisa-nishamura-netflix-documentary-wild-wild-country#intcid=recommendations\\_vanity-fair-similar\\_4cabf493-fa8e-4dd0-8acd-0b9d85e93de5\\_cral1](https://www.vanityfair.com/hollywood/2018/06/lisa-nishamura-netflix-documentary-wild-wild-country#intcid=recommendations_vanity-fair-similar_4cabf493-fa8e-4dd0-8acd-0b9d85e93de5_cral1). An incomplete copy of this article was attached as Exhibit 3 to the Declaration of George Burnett (Dkt. 85-3).

3. Attached hereto as Exhibit B is a true and correct copy of a printout I made of the article, Jethro Nededog, *The 'Making a Murderer' creators detail the intense 10-year path to getting the show on Netflix*, BUSINESS INSIDER (Jan. 20, 2016), <https://www.businessinsider.sg/making-a-murderer-filming-process-netflix-2016-1/>. An incomplete copy of this article was attached as Exhibit 5 to the Declaration of George Burnett (Dkt. 85-5).

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 27, 2019

  
Matthew E. Kelley